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November 6, 2020

VIA ECF

Application granted.

Hon. Ronnie Abrams
U.S. District Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Courtroom 1506
New York, NY 10007

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams
November 9, 2020

**Re: *Paguada v. Vital Proteins LLC*,
Civil Action No.: 1:20-cv-06958-RA (S.D.N.Y.)**

Dear Judge Abrams:

This firm represents Defendant Vital Proteins LLC (“Defendant”) in the above-referenced matter. We write, with the consent of Plaintiff Dilenia Paguada (“Plaintiff”), to respectfully request a thirty (30) day extension of time for Defendant to respond to the Complaint, up to and including December 9, 2020.

By way of background, Plaintiff commenced this action on or about August 27, 2020. (ECF No. 1.) On September 8, 2020, Defendant executed a Waiver of Service of Summons pursuant to Fed. R. Civ. P. 4, which makes Defendant’s responsive pleading deadline November 9, 2020. (ECF No. 6.)

This is Defendant’s first request for an extension of the responsive pleading deadline. Counsel for the parties are exploring a potential non-litigated resolution of this action. Defendant is respectfully requesting that the Court grant this extension to allow the parties to continue focusing their time and resources on these discussions. We have communicated with counsel for Plaintiff, and Plaintiff consents to this request.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this application will not impact any other scheduled deadlines, including the Initial Conference scheduled for December 11, 2020. We thank the Court for its time and attention to this matter.



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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Samuel Sverdlov

Samuel Sverdlov

cc: All counsel of record (via ECF)